

Federal Defenders
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
Attorney-in-Charge

March 9, 2023

Via Email and ECF

Hon. Richard M. Berman
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, NY 10001

Re: *United States v. Robert Hadden*, 20 Cr. 468 (RMB)

Dear Judge Berman,

The defense, with the consent of the government, respectfully asks for a 60-day adjournment of sentencing, which is currently scheduled for April 25, 2023, in order to permit the Probation Department sufficient time to conduct its investigation, the defense psychosexual expert (Dr. Alexander Bardey) sufficient time to interview and evaluate Mr. Hadden, and defense counsel sufficient time to put together a thorough submission, taking into account the PreSentence Report and the psychosexual evaluation. Counsel for the defense and the government are available the last week of June, if that is convenient to the Court.

Thank you for your consideration of this request.

Respectfully Submitted,

_____/s/_____
Deirdre D. von Dornum
Michael D. Weil
Kathryn Wozencroft
Counsel for Robert Hadden

cc: Counsel of Record (by ECF)
U.S. Probation Officer Ashley Geiser (by E-mail)
Robert Hadden (by U.S. Mail)